

Exhibit 7-4

Supplemental Notice Plan

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

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ATTORNEYS FOR DEBTOR

In re:

LTL MANAGEMENT LLC,¹

Debtor.

Chapter 11

Case No.: 23-12825 (MBK)

Judge: Michael B. Kaplan

**DECLARATION OF SHANNON R. WHEATMAN, PH.D
IN SUPPORT OF SUPPLEMENTAL NOTICE PLAN**

I, Shannon R. Wheatman, being duly sworn, hereby declare as follows:

1. I am the Executive Director of Signal Interactive Media (“Signal”), an advertising and notification consulting firm in Washington, D.C. specializing in the design and

¹ The last four digits of the Debtor’s taxpayer identification number are 6622. The Debtor’s address is 501 George Street, New Brunswick, New Jersey 08933.

implementation of bankruptcy and class action notification programs. My business address is 1300 Connecticut Ave. NW, Suite 375, Washington, D.C. 20036.

2. Signal was retained by the Debtor to design and implement the supplemental notice plan (the “Supplemental Notice Plan”) and other related noticing tasks in this chapter 11 case.

3. I submit this declaration (this “Declaration”) in support of the *Debtor’s Motion for Entry of Order (a) Approving Form and Manner of Notice of Hearing on Disclosure Statement; (b) Approving Disclosure Statement; (c) Establishing Solicitation and Tabulation Procedures; (d) Scheduling a Hearing on Confirmation of Chapter 11 Plan and Approving Form and Manner of Notice Thereof; and (e) and Granting Related Relief* (the “Motion”) and the Supplemental Notice Plan described in the Motion and herein.²

4. This Declaration describes my experience in designing and implementing notices and notice programs, as well as my credentials to opine on the overall adequacy of the notice effort. I will also describe the elements of the Supplemental Notice Plan and the Talc Claims Solicitation Notice and the Talc Claims Publication Notice (collectively, the “Notices”), attached hereto as **Exhibit A** and **B**, respectively, including how the Supplemental Notice Plan and Notices were developed and why they will be effective and satisfy the requirements of due process. The Supplemental Notice Plan comprises a comprehensive advertising campaign utilizing television, radio, newspapers, and online media. The scope and selection of media channels and geographical considerations have been guided by careful analysis of multiple data sources providing information concerning potential claimants.

² Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Motion.

5. The total estimated cost of the Supplemental Notice Plan as described herein is approximately \$9,150,000. Implementation of the Supplemental Notice Plan and Supplemental Notice Plan will commence within approximately 14 days of entry of the Court's Solicitation Order, notice will be completed within approximately 60 days thereof. With respect to the impact of the timing on the estimated cost of the Supplemental Notice Plan, if the Supplemental Notice Plan is completed by December 2023,³ the total cost of the media portion of the Supplemental Notice Plan will not change. If the program begins anytime after December 2023, costs will change due to 2024 rate increases.

6. Based on my experience, as set forth below, I believe that the Supplemental Notice Plan, is broad, multi-faceted, and designed to effectively reach known and unknown claimants and parties in interest, including those holders of Direct Talc Personal Injury Claims (referred to herein as "Talc Claims") and the holders of such claims as "Talc Claimants") against the Debtor. Furthermore, the scope of the Supplemental Notice Plan budget is appropriate given the geographical distribution of holders of Talc Claims.

7. Except as otherwise noted herein, the facts set forth in this Declaration are based upon my personal knowledge, my review of relevant documents, and information provided by the Debtor and their other professionals, including professionals at Jones Day, and my associates. The information set forth herein is of a type reasonably relied upon in the fields of advertising, media, and communications. If called upon to testify, I would testify competently to the facts set forth in this Declaration. I am authorized to submit this Declaration.

³ If Court approval of the Supplemental Notice Plan occurs after August 25, 2023, the print portion of the plan may need to be modified to ensure the notice appears before the voting deadline.

RELEVANT EXPERIENCE

8. I have developed and directed some of the largest and most complex national notification programs in the United States. The scope of my work includes notification programs in bankruptcy, antitrust, consumer fraud, mass tort, and product liability litigation. I have developed or consulted on over 700 notification programs and the Signal team has placed over \$2.1 billion in media. I have implemented notice programs reaching people in 72 languages in 214 countries and territories.

9. I have served as a qualified legal notice expert in class action litigations and bankruptcies. State and federal courts have accepted my analyses and expert testimony regarding whether information is effectively communicated to people. My curriculum vitae was attached as Exhibit A to the *Certification of Shannon R. Wheatman, Ph.D. in Support of Application for Retention of Signal Interactive Media, Effective as of April 16, 2023* [Docket No. 527].

10. I have been involved with respect to legal noticing in the following bankruptcy cases: *In re: Aeero Technologies LLC*, No. 22-02890 (Bankr. S.D. Ind.) (Respirator Committee Consultant); *In re Boy Scouts of America and Delaware BSA, LLC*, No. 20-10343 (Bankr. D. Del.) (Debtor Media Consultant); *In re The Roman Catholic Church of The Archdiocese of New Orleans*, No. 20-10846 (Bankr. E.D. La.) (Committee Media Consultant); *In re The Roman Catholic Diocese of Rockville Centre, New York*, No. 20-12345 (Bankr. S.D.N.Y.) (Committee Media Consultant); *In re PG&E Corp.*, No. 19-30088 (Bankr. N.D. Cal.) (Claims Representative Media Consultant); *In re Think Fin., LLC*, No. 17-33964 (Bankr. N.D. Tex) (Class Counsel Media Consultant); *In re Energy Future Holdings Corp.*, No. 14-10979 (Bankr. D. Del.) (Committee Media Consultant); *In re Garlock Sealing Tech. LLC*, No. 10-31607 (Bankr. W.D.N.C.) (Debtor Media Consultant); *In re SCBA Liquidation, Inc., f/k/a Second Chance Body Armor, Inc.*,

No. 04-12515 (Bankr. W.D. Mich. Oct. 17, 2004) (Class Counsel Media Consultant); and *In re W.R. Grace & Co.*, Case No. 01-01139 (Bankr. D. Del.) (Committee Media Consultant).

11. In addition to this experience with noticing programs in bankruptcy cases, I have testified in court as an expert in the following cases: *In re Boy Scouts of America and Delaware BSA, LLC*, No. 20-10343 (Bankr. D. Del.); *In re The Roman Catholic Church of The Archdiocese of New Orleans*, No. 20-10846 (Bankr. E.D. La.); *Kowall v. United States Steel Corp.*, No. 2017-3355 (Wash. County., Pa., Civ. Div.); *In re Chinese-Manufactured Drywall Prods. Liab. Litig.*, MDL No. 2047 (E.D. La.); *In re Think Finance, LLC*, Case No. 17-33964 (Bankr. N.D. Tex.); *In re Volkswagen "Clean Diesel" Marketing, Sales Practices & Prods. Liab. Litig.*, MDL No. 2672 (N.D. Cal.); *State v. Farmer Grp. Inc.*, No. D-1-GV-02-002501 (D. Ct. Tex., Travis Cty.); *Scharfstein v. BP West Coast Prods., LLC*, No. 1112-17046 (Cir. Ct. Or.); *Spillman v. RPM Pizza, Inc.*, No. 10-349 (M.D. La.); *PRC Holdings, LLC v. East Res., Inc.*, No. 06-C-81 (Cir. Ct. W. Va.); *Guidry v. Am. Pub. Life Ins. Co.*, No. 2008-3465 (14th Jud. Dist. Ct., Calcasieu Parish); *Webb v. Liberty Mut. Ins. Co.*, No. CV-2007-418-3 (Cir. Ct. Ark); and *Beasley v. Reliable Life Ins. Co.*, No. CV-2005-58-1 (Cir. Ct. Ark).

12. I have been deposed as an expert in *In re Think Finance, LLC*, No. 17-33964 (Bankr. N.D. Tex.); *Hale v. CNX Gas Co., LLC*, No. 10-CV-59 (W.D. Va.); and *Thomas v. A. Wilbert Sons, LLC*, No. 55,127 (18th Jud. Dist. Ct., Iberville Parish).

13. I have worked on some of the largest and most complex national notification programs in the country, including, without limitation: *In re Domestic Airline Travel Antitrust Litig.*, MDL No. 2656 (D.D.C.) (involving notice to over 100 million airline passengers); *In re Volkswagen "Clean Diesel" Marketing, Sales Practices & Prods. Liab. Litig.*, MDL No. 2672 (N.D. Cal.) (involving notice to over 700,000 Volkswagen, Porsche, and Audi owners/lessees);

Precision Assocs., Inc. v. Panalpina World Transport, No. 08-CV-00042 (E.D.N.Y.) (involving notice to millions of freight forwarding customers); *In re Transpacific Passenger Air Transp. Antitrust Litig.*, MDL No. 1913 (N.D. Cal.) (involving notice to millions of international airline passengers); *In re Dynamic Random Memory Antitrust Litig.*, MDL No. 1486 (N.D. Cal.) (involving notice to over 100 million consumers); *In re TFT-LCD (Flat Panel) Antitrust Litig.*, MDL No. 1827 (N.D. Cal.) (involving notice to millions of indirect purchasers); *In re Oil Spill by the Oil Rig "Deepwater Horizon" in the Gulf of Mexico on April 20, 2010*, MDL No. 2179 (E.D. La.) (involving notice to over 40 million people impacted by the oil spill); *In re Target Corp. Customer Data Sec. Breach Litig.*, MDL No. 14-2522 (D. Minn.) (involving notice to over 40 million consumers); *In re Sony Gaming Networks & Customer Data Sec. Breach Litig.*, No. 11-MD-2258 (S.D. Cal.) (involving notice to over 70 million user accounts).

14. My qualifications include expertise with respect to the form and content of notice. For example, while serving with the Federal Judicial Center ("FJC"), I played an integral part in the development of the illustrative, "model" forms of notice designed to satisfy the plain language requirements of Federal Rule of Civil Procedure 23(c)(2). This research formed the basis for my doctoral dissertation, *The Effects of Plain Language Drafting on Layperson's Comprehension of Class Action Notices* (2001) (Ph.D. dissertation, University of Georgia). To assist judges and attorneys, both in state and federal courts, the FJC posted the notices at www.fjc.gov.

15. In addition to extensive experience in the design and implementation of noticing programs in a variety of bankruptcy and class action litigation, I have authored and co-authored articles on notice and due process. I believe that notice and due process depend upon clear communication with the affected people and have stated this position in my publications. *See, e.g.,* Shannon R. Wheatman & Katherine M. Kinsella, *International Class Action Notice*, WORLD

CLASS ACTION: A GUIDE TO GROUP AND REPRESENTATIVE CLASS ACTIONS AROUND THE GLOBE 673–86 (Paul Karlsgodt ed., 2012); Katherine Kinsella & Shannon Wheatman, *Class Notice and Claims Administration*, PRIVATE ENFORCEMENT OF ANTITRUST LAW IN THE UNITED STATES: A HANDBOOK 338–48 (Albert A. Foer & Randy M. Stutz eds., 2012); Shannon R. Wheatman & Terri R. LeClercq, *Majority of Class Action Publication Notices Fail to Satisfy Rule 23 Requirements*, 30 REV. LITIG. 53 (2011); Katherine Kinsella & Shannon R. Wheatman, *Class Notice and Claims Administration*, THE INTERNATIONAL PRIVATE ENFORCEMENT OF COMPETITION LAW 264–74 (Albert A. Foer & Jonathan W. Cuneo eds., 2010); Todd B. Hilsee, Shannon R. Wheatman & Gina M. Intrepido, *Do you really want me to know my rights? The ethics behind due process in class action notice is more than just plain language: A desire to actually inform*, 18 GEO. J. LEGAL ETHICS 1359 (2005); and Todd B. Hilsee, Gina M. Intrepido & Shannon R. Wheatman, *Hurricanes, Mobility and Due Process: The “Desire-to-Inform” Requirement for Effective Class Action Notice Is Highlighted by Katrina*, 80 TULANE LAW REV. 1771 (2006).

SUPPLEMENTAL NOTICE PLAN OVERVIEW

16. The objective of the Supplemental Notice Plan is to provide fair and adequate notice of the Plan to potential Talc Claimants in the U.S. and Canada who are unknown to the Debtor.

17. To effectively reach potential claimants, Signal recommends a Supplemental Notice Plan consisting of the following:

MEDIA	AREA	DESCRIPTION
Television	U.S.	❖ ABC, CBS, NBC, FOX News, Hallmark, HGTV (U.S.)
	Canada	❖ CTV, CBC, CCAN, GCAN (Canada)
Radio	U.S. Canada	❖ National radio in U.S.
		❖ Local U.S. radio targeting top African American markets
		❖ Local U.S. Spanish radio targeting top Hispanic markets
		❖ Streaming radio in U.S. and Canada

MEDIA	AREA	DESCRIPTION
<i>Print</i>	U.S. + Territories Canada	<ul style="list-style-type: none"> ❖ Leading national newspaper in the US ❖ 2 U.S. and 5 Canadian consumer magazines ❖ 8 U.S. Territories and Possessions newspapers ❖ Highest circulating newspaper in Top 10 U.S. African American and Hispanic markets ❖ 3 newspapers in Canada ❖ Print ads in English, Spanish, and French
<i>Online</i>	U.S. + Territories Canada	<ul style="list-style-type: none"> ❖ Targeted Online ❖ Social Media (Facebook/Instagram, YouTube) ❖ Keyword Search Campaign ❖ Advertisements in English, Spanish, and French
<i>Earned</i>	U.S. Canada	<ul style="list-style-type: none"> ❖ Bilingual press releases in the U.S. (English/Spanish) and Canada (English/French).

18. As set forth below, I believe this Supplemental Notice Plan exceeds the requirements of due process and effectively reaches the target of unknown and potential claimants.

19. More details about each component of the Supplemental Notice Plan and how the program was developed are described below.

I. Demographics and Location of Potential Talc Claimants

20. To develop the Supplemental Notice Plan and determine how best to reach potential claimants, I reviewed and analyzed various sources of information and data as detailed below.

21. I reviewed data provided by the Debtor that included pending claims against the Debtor, either through filed litigation or reported by plaintiffs' attorneys.

22. Based on my review and analysis, the following information helped shape the proposed Supplemental Notice Plan:

A. Age and Gender of Potential Claimants

- (i) Known Talc Claimant ages range from 1 to 98 years old.

(ii) Below is a breakdown of known Talc Claimants' ages at diagnosis:

AGE	GYNECOLOGIC CANCER	MESOTHELIOMA	TOTAL	PERCENT OF KNOWN
1-17	114	0	114	0.39%
18-24	604	4	608	2.08%
25-39	3,659	33	3,692	12.62%
40-49	5,607	42	5,649	19.31%
50+	18,801	390	19,191	65.60%
Age Unknown	11,638	179	11,818	
Total Age Known	28,065	468	29,254	
Total Claims	39,703	648	41,072 ⁴	

- (iii) Approximately 96.7 percent of Talc Claims were filed by women and 0.3 percent by men.
- (iv) The average age is 54 years for gynecologic cancer claimants and 64 years for mesothelioma claimants.
- (v) I estimate that 65.4 percent of Talc Claimants are women, 50 years and older ("Women 50+") and 88.0 percent are adults 35 years and older ("Adults 35+").

B. Talc Claimant Diseases

- (i) As seen in the claimant data, the risk of developing gynecologic cancer increases with age. Gynecologic cancer is rare in women younger than 40 and most diagnoses occur after menopause.
- (ii) The incidence of mesothelioma is much lower than ovarian cancer. "Mesothelioma incidence ranged from 0.5 to 1.3 cases per 100,000 persons and ovarian cancer incidence ranged from 9 to 12 cases per 100,000 females."⁵
- (iii) The average age for a mesothelioma diagnosis is 71 for women and 75 for men.⁶

⁴ There are 64 claims from residents of Canada.

⁵ S. Jane Henley et. al, *Geographic co-occurrence of mesothelioma and ovarian cancer incidence*, J WOMENS HEALTH, 111-118 (Jan. 29, 2020).

⁶ KCIC Industry Report, *Asbestos Litigation 2020 Year in Review*, at https://www.kcic.com/media/2153/kcic_asbestos2020report.pdf (last visited Apr. 11, 2023)

- (iv) Around 95 percent of diagnosed mesothelioma patients are white.⁷

C. Languages

- (i) Media survey data from 2019 that measured demographics of JOHNSON'S® Baby Powder (“Baby Powder”) users found that approximately 9 percent spoke Spanish at home.⁸
- (ii) French is the first official language spoken by 22.8 percent of the Canadian population.⁹ Data on French speakers in Canada show the majority of French speakers are in Québec and New Brunswick:¹⁰

PROVINCE & TERRITORIES	FRENCH SPEAKERS
Québec	82%
New Brunswick	30%
Yukon	5%
Ontario	3%
Manitoba	3%
Nova Scotia	3%
Prince Edward Island	3%
Northwest Territories	3%
Alberta	2%
Nunavut	2%
British Columbia	1%
Saskatchewan	1%
Newfoundland and Labrador	<1%

II. Target Audience: Selection Methodology and Demographics

23. Signal employs methodology and measurement tools used in the media planning and advertising industry for designing and measuring the adequacy of a paid media program to

⁷ Asbestos.com, *Mesothelioma Death and Mortality Rate*, at <https://www.asbestos.com/mesothelioma/death-rate/> (Apr. 11, 2023).

⁸ 2019 Gfk MRI Doublebase.

⁹ Government of Canada, *Some facts on the Canadian Francophonie*, at <https://www.canada.ca/en/canadian-heritage/services/official-languages-bilingualism/publications/facts-canadian-francophonie.html> (last visited May 1, 2023).

¹⁰ Statistics Canada, *The proportion of the population whose first official language spoken is French is the highest in Quebec, followed by New Brunswick and Yukon*, <https://www150.statcan.gc.ca/n1/daily-quotidien/220817/mc-a001-eng.htm> (last visited Apr. 18, 2023).

reach a particular audience. To design the paid media notice segment of the Supplemental Notice Plan, Signal identified and selected demographics that encompass the characteristics of potential claimants. Signal analyzed and selected media vehicles for their strength and efficiency in reaching these demographic targets and then quantified results to be used in determining the adequacy of the notice.

24. For the purpose of developing profiles of the demographics and the media habits of potential claimants, Signal analyzed syndicated data available from 2022 MRI-Simmons Spring Doublebase,¹¹ comScore,¹² Nielsen,¹³ and Vividata.¹⁴

25. Signal reviewed media survey data to locate relevant information on Johnson & Johnson (“J&J”) talc product users during years when baby powder (prior to 2020) and Shower to Shower (prior to 2012) were still being sold by the company. The demographics of J&J talc users show:

PRODUCT	SURVEY YEAR	GENDER	AGE	RACE	HOUSEHOLD INCOME	LOCATION OF USERS
Baby Powder ¹⁵	2019	60% Women	70% Age 35+ 54% Age 50+ Median = 49	67% White 22% African American/Black 15% Hispanic	64% <\$75k	Midwest: 19% Northeast: 24% South: 41% West: 16%

¹¹ MRI-Simmons is a nationally accredited media and marketing research firm that provides syndicated data on audience size, composition, and other relevant factors pertaining to major media. MRI-Simmons provides a single source of major media, products, services, and in-depth consumer demographic and lifestyle/psychographic characteristics. MRI-Simmons produces an annual Doublebase, a study of more than 50,000 adults providing two full years of data.

¹² comScore, Inc. is a source of Internet audience measurement for advertising agencies, publishers, marketers, and financial analysts. comScore measures Internet usage and other activity through monitoring software installed on the computers of a panel of approximately two million people. Active in 170 countries, comScore tracks more than three million unique websites.

¹³ Nielsen Company is the leading provider of broadcast audience measurement and related services worldwide. In the United States, Nielsen’s National TV People Meter service provides audience estimates for all national program sources, including broadcast networks, cable networks, Spanish language networks, and national syndicates. Nielsen//Net Ratings reports online audiences.

¹⁴ Vividata measures demographic, media habits, and print readership in Canada using data from over 35,000 respondent surveys.

¹⁵ 2019 Gfk MRI Doublebase

PRODUCT	SURVEY YEAR	GENDER	AGE	RACE	HOUSEHOLD INCOME	LOCATION OF USERS
Shower to Shower ¹⁶	2010	69% Women	75% Age 35+ 53% Age 50+ Median = 56	67% White 25% African American/Black 11% Hispanic	77% <\$75k	Midwest: 21% Northeast: 19% South: 48% West: 12%

26. While characteristics of J&J talc users were considered for directional purposes, a broader age and gender target is required for purposes of buying and measuring all media components.

27. Based on the data analysis provided above, two target audiences were chosen to measure the Supplemental Notice Plan against:

- (i) The primary target is Women 50 years and older.
- (ii) The secondary target is Adults 35 years and older.

III. Target Audiences: Media Usage

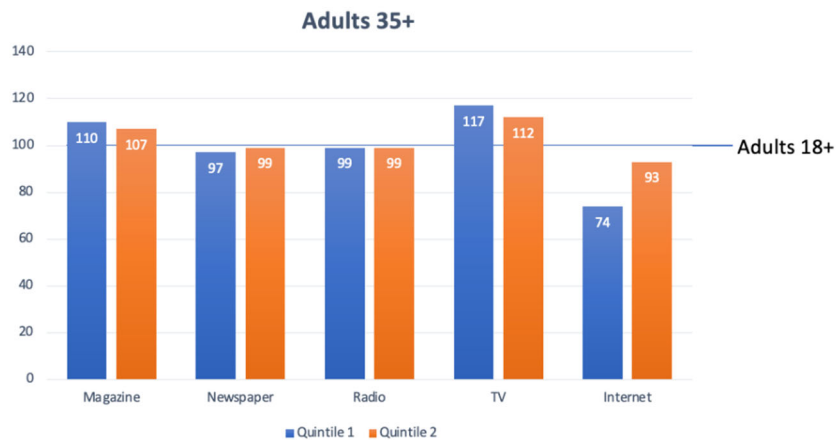
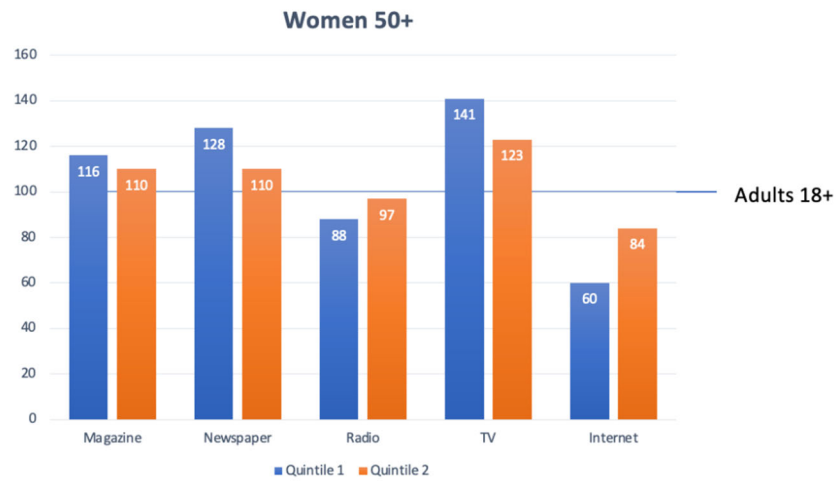
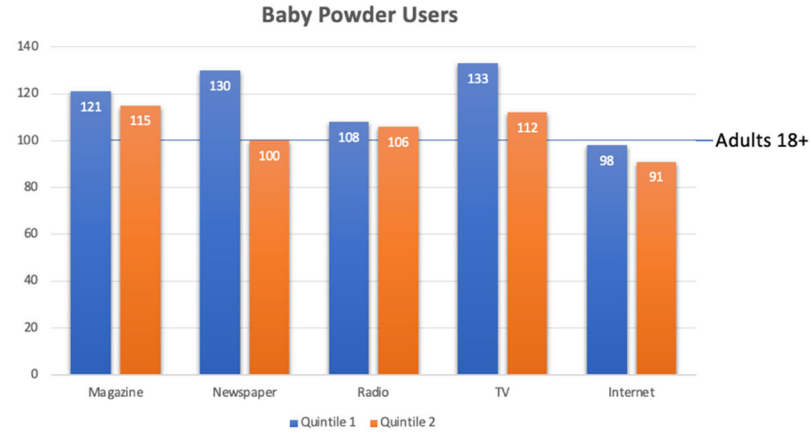
28. Individuals spend varying amounts of time with different types of media. Certain demographic groups may be heavy consumers, light consumers, or non-users of a particular medium. To examine the media habits of the target audiences, Signal compares the target audience's media usage to that of the average adult 18 years of age and older ("Adults 18+") in usage quintiles¹⁷ reported by MRI-Simmons.

29. The following charts illustrate the target audiences' top two quintiles¹⁸ (heaviest and next heaviest usage) for each type of media in the U.S.:

¹⁶ 2010 Gfk MRI Doublebase

¹⁷ The media usage of the target audience in each quintile is expressed as an index. An index of 100 is the average adult's media usage. An index above 100 indicates a heavier usage of the medium than the average adult, and an index below 100 indicates a lighter usage of the medium than the average adult.

¹⁸ Measurement of Baby Powder Users comes from a 2019 media survey when the Debtor's product was still being sold in the U.S.



30. The table below reflects the target audiences' media consumption habits in the U.S.:

MEDIA	BABY POWDER USERS		WOMEN 50+		ADULTS 35+	
	Average Use	% of target	Average Use	% of target	Average Use	% of target
Magazines (# read in month)	8.4	69.5%	4.6	83.4%	4.1	78.0%
Newspapers (# read in month)	16.0	44.5%	17.8	40.9%	17.0	37.0%
Network Radio (hours per week)	16.5	73.8%	14.0	76.2%	15.0	80.6%
Television (hours per week)	36.7	91.6%	41.0	95.4%	36.4	93.3%
Internet (hours per week)	24.4	73.6%	24.0	93.9%	26.0	94.3%

31. The data indicate that:

- (i) Baby Powder Users are heavy television viewers and newspaper readers, above average magazine readers, average radio listeners, and light Internet users.
- (ii) Women 50+ are heavy television viewers and newspaper readers, above average magazine readers, and light radio and Internet users.
- (iii) Adults 35+ are heavy television viewers, above average magazine readers, average newspaper readers, and light Internet users.

32. Canadian media usage for our two target audiences are below.¹⁹

MEDIA	WOMEN 50+	ADULTS 35+
Magazines	33%	32%
Newspapers	40%	41%
Radio	83%	81%
Television	92%	90%
Internet	94%	95%

33. Based on the target audiences' media consumption habits, Signal researched the most appropriate media vehicles for this chapter 11 case. Signal also reviewed available broadcast, print, and online opportunities to reach the target audiences.

¹⁹ Vividata does not measure Johnson Baby Powder users.

34. The proposed Supplemental Notice Plan includes placements in media vehicles whose audiences are more likely to include potential claimants, ensuring coverage across all segments of the target audiences.

IV. Media Components

35. The core of the Supplemental Notice Plan is paid media,²⁰ which includes television, radio, magazines, newspapers, and online media. An earned media program will also be implemented through the Supplemental Notice Plan to amplify the paid media advertisements and provide additional coverage to allow potential claimants to learn more.

A. Television

36. Television has the ability to reach a target audience with an immediate and accessible message. The combination of audio and visual message delivery increases the impact. Viewers can quickly ascertain if the message is important and if so, decide to respond.

37. Notice in the form of 30-second advertisements will be aired throughout the day on national broadcast and cable networks and on devices connected to the Internet (“Connected TV”).

38. National television spots²¹ in the U.S. and Canada will run for three to four weeks. Delivery estimates are based on purchasing 338 Women 50+ target rating points (“TRPs”)²² in the U.S. and 221 Women 50+ TRPs in Canada. However, the television advertising will reach

²⁰ Publishers have the right to refuse the Debtor’s advertisements. Signal will make every effort to have the advertisements placed in the publications as laid out in the Supplemental Notice Plan but will make substitutions as necessary. In addition, if a publication asks Signal to add language, and that language does not substantively change the message of the advertisement, Signal will make substitutions as necessary to maintain the proposed schedule.

²¹ The national U.S. television buy includes limited coverage of U.S. territories.

²² Target Rating Points represent the sum of the ratings delivered by a media vehicle in a schedule. A rating is the percentage of persons in the target who have been exposed to the media vehicles in the schedule. One TRP equals 1% of a given target population.

potential claimants of all ages.²³ Television advertisements will air across various dayparts²⁴ or times of day to reach the largest number of viewers.²⁵

39. The U.S. National Television media plan includes broadcast (CBS, ABC, NBC) and cable networks (FOX News Network, Hallmark, HGTV). FOX News Network is the number one cable network on reach against Women 50+. In addition, Hallmark and HGTV are the 3rd and 4th ranked cable networks against Women 50+.

40. The Canadian National Television media plan includes broadcast on four English networks (CTV, CBC, CCAN, GCAN) and the French language CBC affiliate (CBFT) that airs in Québec.

41. Connected TV enables users to access content without going through a cable operator or satellite set-top box (e.g., Amazon, Roku, Xbox, PlayStation). In the U.S., 46 percent of all adults stream video on a connected TV device and 87 percent of U.S. television households have at least one Internet-connected television device.²⁶ In Canada, 49 percent of households watch television on a connected device and 58 percent of Canadian households own at least one connected device.²⁷

²³ Inventory is subject to change at the time of actual placement based on availability and market conditions. Should television delivery fall short due to inventory issues, budget will be re-allocated to radio/internet in order to make-up delivery.

²⁴ A daypart is a division of the broadcast day into segments (e.g., morning, daytime, early fringe, prime time, late news, late fringe, and late nighttime slots). The type of content provided to audiences will vary, depending on the daypart within which they are scheduled.

²⁵ The television schedule will not be known until a week prior to airing. The schedule will be shared with the Debtor and the Committee when it is received from the stations.

²⁶ TV Tech, *Nearly Half of Adults Watch Video on a Connected TV Each Day*, at <https://www.tvtechnology.com/news/nearly-half-of-adults-watch-video-on-a-connected-tv-each-day> (last visited Apr. 22, 2023).

²⁷ Media in Canada, *Connected TV ownership has doubled in two years*, at <https://mediaincanada.com/2022/10/03/connected-tv-ownership-has-doubled-in-two-years/#:~:text=The%20new%20report%20estimated%20that,said%20the%20same%20in%202020>. (last visited Apr. 22, 2023).

42. Advertisements will run on Connected TV in the U.S. and Canada for three to four weeks during programs that are streamed online through video services, including Hulu, Sling, Univision, DirecTV Stream, Crackle, and Tivo.

B. Radio²⁸

43. Radio functions primarily as a frequency-building medium. When used in conjunction with television, radio efficiently provides multiple opportunities for exposure to a message.

44. Notice in the form of 30-second national radio spots will run for two to four weeks on national network radio, local radio, and streaming radio.

45. National Network Radio in the U.S. is bought in the form of network programming (as opposed to specific stations or dayparts), and buys can be tailored for a specific age group of people based on a network's typical listeners. Delivery estimates for Network Radio in the U.S. are based on purchasing 112 Women 50+ TRPs. Programming will reach potential claimants of all ages.

46. National Network Radio will be bought through KATZ Alliance, Westwood One, and Female Focus. Programming will air on adult contemporary, country, urban, and contemporary hit stations.

47. African American radio will reach the top performing stations in the markets with heavy concentrations of African Americans: Atlanta, Chicago, Dallas, Houston, and Washington, D.C. African American radio formats will include: urban adult contemporary, urban contemporary, urban inspirational/gospel, and rhythmic adult contemporary.

²⁸ Specific programming will depend upon availability at the time that media is purchased.

48. Local Hispanic stations in the U.S. will be used to reach potential claimants who speak Spanish. Signal will target Hispanic radio to the top markets with large Hispanic populations in Dallas, Houston, Miami, Phoenix, and San Antonio. Hispanic radio formats will include: Spanish contemporary, Mexican regional, tropical, and Spanish adult hits.

49. Streaming Radio is a technology that transmits audio over the internet to any connected device. Streaming services are available in the form of music and terrestrial radio stations. Advertisements will be purchased on music streaming services in the U.S. on Pandora and in Canada on Spotify.

C. Print

50. Signal chose the specific consumer publications listed below for the Supplemental Notice Plan because they are among the highest ranking in coverage of the various target audiences.

51. The Talc Claims Publication Notice will appear in the leading national newspaper in the U.S., *The Wall Street Journal*, with a circulation of 645,804.

52. The Talc Claims Publication Notice will appear as a full-page ad in two U.S. and five Canadian consumer magazines.

PUBLICATION	AREA	READERSHIP	NUMBER OF INSERTIONS	DESCRIPTION
<i>Canadian Living</i>	Canada	2,156,000	1	Published 10 times a year. Lifestyle magazine, which publishes articles relating to food, fashion, crafts, and health and family advice
<i>Hello! Canada</i>	Canada	685,000	1	Bi-weekly magazine offering celebrity and royal news, world-exclusive stories, society, high fashion, lifestyle, beauty recipes, and world affairs.
<i>L'actualité</i>	Canada (French)	567,000	1	News and general interest magazine published 10 times a year.

PUBLICATION	AREA	READERSHIP	NUMBER OF INSERTIONS	DESCRIPTION
<i>Maclean's</i>	Canada	1,234,000	1	Monthly news magazine reporting on Canadian issues such as politics, pop culture, and current events.
<i>People</i>	U.S.	22,409,000	2	Weekly publication covering personalities in entertainment, politics, business, and other current events.
<i>Reader's Digest Canada</i>	Canada (English & French)	2,400,000 English 381,000 French	1	Published 10 times a year. Includes selected excerpts from other publications as well as original pieces.
<i>Woman's World</i>	U.S.	3,674,000	1	Weekly magazine focused on health and wellness advice, diet tips, healthy recipes, fashion, and beauty tips.

53. The Talc Claims Publication Notice will appear in the highest circulating newspapers in areas with the heaviest concentration of African Americans and Hispanic populations. A Spanish language ad will be used in all Hispanic publications.

TARGET	MARKET	NEWSPAPER	CIRCULATION
African Americans	Philadelphia Metro Area	<i>Philadelphia Tribune</i>	140,000
African Americans	New York	<i>Rolling Out New York</i>	76,007
African Americans	Illinois, St. Louis, Madison and St. Charles counties	<i>St. Louis American</i>	70,000
African Americans	Washington, D.C.	<i>Rolling Out Washington D.C.</i>	57,385
African Americans	Baltimore	<i>Rolling Out Baltimore</i>	52,638
African Americans	Detroit	<i>Rolling Out Detroit</i>	51,426
African Americans	Atlanta	<i>Rolling Out Atlanta</i>	49,819
African Americans	Chicago	<i>Rolling Out Chicago</i>	48,803
African Americans	Memphis	<i>Rolling Out Memphis</i>	34,920
African Americans	New Orleans	<i>Louisiana Weekly</i>	6,500
Hispanic	Los Angeles	<i>El Aviso</i>	325,000
Hispanic	Chicago	<i>Lawndale Group News</i>	230,000
Hispanic	Houston	<i>La Voz De Houston</i>	189,579
Hispanic	Miami/Ft. Lauderdale	<i>El Clarin</i>	185,000

TARGET	MARKET	NEWSPAPER	CIRCULATION
Hispanic	New York	<i>El Especialito</i>	150,000
Hispanic	San Francisco/Oakland/ San Jose	<i>La Opinion De La Bahia</i>	104,000
Hispanic	Dallas/Ft. Worth	<i>Al Dia</i>	100,000
Hispanic	San Antonio	<i>Conexion</i>	68,240
Hispanic	Phoenix	<i>Prensa Arizona</i>	65,000
Hispanic	Harlingen/Weslaco/ Brownsville/McAllen	<i>El Extra</i>	50,630

54. The Talc Claims Publication Notice will be translated, when necessary, and appropriately sized for placement in the following newspapers in U.S. territories and possessions:

U.S. TERRITORY/POSSESSION	NEWSPAPER	CIRCULATION
American Samoa	<i>Samoa News</i>	4,500
Guam	<i>Pacific Daily News</i>	645,804
Mariana Islands	<i>Saipan Tribune</i>	6,730
Puerto Rico	<i>El Nuevo Dia</i>	19,357
Puerto Rico	<i>Primera Hora</i>	7,200
Puerto Rico	<i>San Juan Daily Star</i>	248,000
U.S. Virgin Islands	<i>St. Croix Avis</i>	186,580
U.S. Virgin Islands	<i>Virgin Island Daily News</i>	62,000

55. Top newspapers in Canada will be used to reach potential claimants in English and French.

NEWSPAPER	LANGUAGE	CIRCULATION
<i>Globe and Mail</i>	English	356,773
<i>Le Journal de Montréal</i>	French	241,485
<i>Le Journal de Québec</i>	French	160,993

D. Online

56. Internet advertising delivers an immediate message and allows the viewer to click on a banner advertisement and instantly be directed to the Debtor's case website for further information. Banner ads are typically located either at the top or side of a website page. In addition

to static banner ads, Signal will use highly engaging animated banner ads and in-banner video ads, which are more likely to capture viewers' attention because they include moving images and text.

57. Signal will purchase over 110 million gross impressions²⁹ in the U.S. and over 24 million gross impressions in Canada. These impressions will be targeted to reach potential Talc Claimants across various websites. Impressions will be allocated to maximize exposure during the campaign across websites to ensure optimal ad delivery.

58. Online ads will appear over nine weeks and be delivered across devices (desktop, mobile, and tablet).

59. Online impressions will be delivered using the following targeting strategies:

- (i) Behavioral Targeting: Ads targeted to people based on their previous online activities (*e.g.*, if they purchased baby powder, Shower to Shower, or related products, or if they viewed or searched for content related to baby powder, the bankruptcy, or gynecologic cancer).
- (ii) Channel/Contextual: Ads targeted to websites with editorial content related to gynecologic cancers, mesothelioma, or the bankruptcy.
- (iii) Demographic Targeting: Ads targeted to people based on their sex, age, ethnicity, language, and household income³⁰ (*e.g.*, targeting Hispanic women over age 45 with a household income under \$75,000).
- (iv) Interest Targeting: Ads targeted to people based on topics in which they have expressed interest or previously engaged online, including baby powder.
- (v) Location Targeting: (U.S. Only) Ads targeted to people based on population distribution (*e.g.*, cities and zip codes with a high percentage of African American and Hispanic residents) and to Southern states.
- (vi) Membership Targeting: Ads targeted to people who follow relevant Facebook pages or who are members of select social media groups, including groups concerning ovarian cancer, mesothelioma, or other

²⁹ Gross impressions are the total number of times a digital ad will be shown. This figure does not represent the total number of unique viewers of the ad, as some viewers will see the ad more than once.

³⁰ We can only measure ethnicity in the U.S.

relevant topics (*e.g.*, Ovarian Cancer Awareness, Mesothelioma Straight Talk for Patients).

- (vii) Out of Home: (U.S. Only) Video and static advertisements will be displayed on digital screens in Quest Diagnostic Labs and/or pharmacies. Ads will serve in select locations.
- (viii) Retargeting: Ads targeted to users who previously clicked on an ad about the bankruptcy or visited the chapter 11 case websites.

60. A third-party ad management platform, Moat, will be used to audit the digital ad placements. These platforms will help reduce the investment wasted on fraudulent or otherwise invalid traffic (*e.g.*, ads being seen by ‘bots’ or non-humans, ads not viewable, etc.) and ensure brand safety using whitelisting.³¹

E. Social Media to Potential Claimants

61. Ads will be delivered on three social media networks. Approximately 79 percent³² of all U.S. Internet users and 86 percent³³ of all Canadians use social media. Text, image, and video ads will be purchased on social media networks as follows:

NETWORK	LANGUAGE	DESCRIPTION
Facebook/Instagram	U.S.: English & Spanish	Newsfeed ads targeted to: (1) Women 50+; (2) Adults 35+; (3) African Americans; (4) Hispanics; (5) Women with a HHI <\$75,000; (6) users with an interest in baby powder; and (7) users in select gynecologic cancer and mesothelioma groups.

³¹ Whitelisting places the ad on selected website domains that are vetted for audience delivery and performance.

³² Data Reportal, *DIGITAL 2023: THE UNITED STATES OF AMERICA*, <https://datareportal.com/reports/digital-2023-united-states-of-america#:~:text=More%20broadly%2C%2079.0%20percent%20of,while%2046.1%20percent%20were%20male> (last visited Apr. 22, 2023).

³³ Data Reports, *DIGITAL 2023: CANADA*, <https://datareportal.com/reports/digital-2023-canada#:~:text=The%20state%20of%20digital%20in%20Canada%20in%202023&text=Canada%20was%20home%20to%2033.10,percent%20of%20the%20total%20population> (last visited Apr, 22, 2023).

	Canada: English & French	Newsfeed ads targeted to: (1) Women 50+; (2) Adults 35+; (3) users with an interest in baby powder; and (4) users in select gynecologic cancer and mesothelioma groups.
YouTube	U.S.: English	Ads targeted to channels for (1) African American networks including BET, TheGrio, Bounce, Fox Soul, OWN, REVOLT, TV One, VH1; (2) Hispanic networks including Univision, Telemundo English, Estrella, and UniMas; (3) Beauty over age 40 (The Style and Beauty Doctor, What Would Lizzy Do), and (4) health and wellness (The Tennile Life, Dulce Dadga). Ads targeted to topics, including gynecologic cancer and mesothelioma.
	Canada: English	Ads targeted to topics, including gynecologic cancer and mesothelioma.

62. To help search engine users locate the Debtor’s chapter 11 case website in the U.S. and Canada, Signal will publish a search campaign to appear on Google, Bing, and other partner networks when searchers enter certain terms (*e.g.*, baby powder litigation, talc bankruptcy, Shower to Shower lawsuit). When a user searches online for one of the specified search terms or phrases in English, Spanish, French, an advertisement will appear on the results page that will point users to the chapter 11 case website.

V. Paid Media Delivery

63. For the purpose of evaluating the strength and efficiency of the media, Signal measured the television, radio, magazines, and online advertising against the target audiences to establish the estimated reach of the media program and the estimated frequency of exposure to the media vehicles.

- (i) U.S. Delivery: An estimated 94.8% of Women 50+ will be reached with an average estimated frequency of 6.1 times and 83.9% of Adults 35+ will be reached with an average estimate frequency of 4.4.

- (ii) Canadian Delivery: An estimated 85.0% of Women 50+ will be reached with an average estimated frequency of 3.6 times and 80.0% of Adults 35+ will be reached with an average frequency of 3.7 times.

64. The combination of reach and frequency of the target audiences in this chapter 11 case compares favorably to other high-profile bankruptcy and class action cases that involved noticing programs for unknown claimants:

CASE	U.S. REACH/ FREQUENCY	CANADIAN REACH/ FREQUENCY
<u>In re: Purdue Pharma L.P.</u> , Case No. 19-23649 (<i>Bankr. S.D. N.Y.</i>)	95%/6.0	80%/3.0
<u>In re Imerys Talc America, Inc.</u> , Case No. 19-10289 (<i>Bankr. D. Del.</i>)	81%/4.0	75%/5.0
<u>In re Boy Scouts of America and Delaware BSA, LLC</u> , Case No. 20-10343 (<i>Bankr. D. Del.</i>)	96%/5.0	N/A
<u>In re PG&E Corp.</u> , Case No. 19-30088 (<i>Bankr. N.D. Cal.</i>)	95%/8.0	N/A
<u>In re Garlock Sealing Tech. LLC</u> , Case No. 10-31607 (<i>Bankr. W.D.N.C.</i>)	95%/4.4	73%/2.9
<u>In re Takata Airbag Prods. Liability Litig.</u> , MDL No. 2599 (<i>M.D. Fla.</i>)	95%/4.0	N/A
<u>In re Oil Spill by Oil Rig Deepwater Horizon</u> , MDL No. 2179 (<i>E.D. La.</i>)	95%/4.0	N/A
<u>In re W.R. Grace & Co.</u> , Case No. 01-01139 (<i>Bankr. D. Del.</i>)	91%/3.7	80%/1.9
<u>In re Babcock & Wilcox Co.</u> , Case No. 00-10992 (<i>Bankr. E.D. La.</i>)	94%/4.4	N/A

VI. Earned Media

65. An earned media program will be implemented to amplify the paid media and provide additional notice to potential claimants. Bilingual press releases will be distributed in the U.S. (English and Spanish) and Canada (English and French) on PR Newswire news circuits reaching traditional media outlets (television, radio, newspapers, magazines) and national websites. The release will highlight the toll-free telephone number and case website address, so that potential claimants can obtain information.

VII. Case Website

66. An informational website for the Debtor's chapter 11 cases is currently available at <https://dm.epiq11.com/ltl/>. Signal suggests that a new landing page, www.OfficalTalcClaims.com, be used for the advertising program that will require a shorter URL that is easier to remember. This will be a dedicated information page, in plain language, for talc claimants that will link to the solicitation agent's website. Once the Supplemental Notice Plan is approved and the voting deadline is set, the case website will be updated to include the Talc Claims Publication Notice, Talc Claims Solicitation Notice, and the Direct Ballot. These documents will also be available in Spanish and French. All media will direct potential claimants to this case website for more information.

VIII. Toll-Free Telephone Support

67. The Debtor established a toll-free phone number (888-431-4056) and an international phone number (+1-503-822-6762) at the outset of this chapter 11 case, which potential claimants will continue to be able to call for information about the bankruptcy. Once the Supplemental Notice Plan is approved, potential claimants will be able to call to request that a solicitation package be mailed to them. Television, radio, and print ads will include the Debtor's toll-free telephone number.

THE FORM AND CONTENT OF THE NOTICES

68. Forms of the Talc Claims Solicitation Notice and Talc Claims Publication Notice are attached to this Declaration as **Exhibits A** and **B**, respectively.

69. The Talc Claims Publication Notice is designed to capture the attention of potential claimants with a clear headline and plain language text. These notices provide important information regarding the Debtor's bankruptcy case and the legal rights available to claimants with respect to the Talc Claims and the Plan, and direct readers to the bankruptcy case website and toll-

free phone number for more information.

70. The Talc Claims Solicitation Notice provides key information about this chapter 11 case and the Voting Deadline in an easy-to-use question and answer format. The information provided in the Talc Claims Solicitation Notice is drafted to allow potential claimants to easily understand their legal rights and to understand the plan of reorganization, voting deadline, and the confirmation hearing, and informs claimants regarding what to expect in this chapter 11 case as it progresses. The Talc Claims Solicitation Notice will be available at the case website.

71. The Talc Claims Solicitation Notice and Talc Claims Publication Notice will be translated into Spanish and French.

CONCLUSION

72. In my experience and opinion, the breadth, comprehensiveness, and efficacy of this Supplemental Notice Plan is well beyond what is typical in chapter 11 noticing programs. The reach of potential claimants through television, radio, magazines, newspapers, and online advertisements as well as the press release will provide known and unknown claimants—particularly potential claimants—with multiple exposures to information about the Plan and the Debtor's chapter 11 case.

73. The Supplemental Notice Plan is broad, multi-faceted and designed to reach the target audiences in a variety of ways. In total, the Supplemental Notice Plan is estimated to reach approximately 95.6% of Women 50+ in the U.S. and 85.0% of Women 50+ in Canada. This represents an optimal reach and frequency for the Supplemental Notice Plan, in addition to reaching a secondary audience as described in detail above. When combined with the other methods of notice of these chapter 11 cases of the Plan, Voting Deadline, and Confirmation Hearing—including unmeasured methods such as Connected Television, streaming radio, and

targeted online advertising—I believe that the overall effort will achieve even greater results.

74. It is my opinion that the reach of the target audiences and the number of exposure opportunities to the notice information through extensive notice and paid media will effectively and efficiently reach the target audiences and satisfies due process. The Supplemental Notice Plan is consistent with the standards employed by Signal and in similar noticing programs designed to reach both known and unknown claimants.

I declare under penalty of perjury that, after reasonable inquiry, the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated: July 11, 2023
Souderton, Pennsylvania

/s/ Shannon R. Wheatman

Shannon R. Wheatman, Ph.D.
Executive Director, Signal Interactive Media

EXHIBIT A

\$12 Billion Plan Proposed to Pay Sick Talc Users

Your rights could be impacted by a bankruptcy if you are sick now or in the future from ovarian cancer, mesothelioma, or other talc-related illnesses.

- Please read this notice carefully, as it may impact your rights.
- Johnson & Johnson (“J&J”) and a subsidiary, LTL Management LLC (“LTL”), have agreed to pay \$12.08 billion over 25 years to people who claim talcum powder products made them sick. J&J and LTL maintain that their products are safe, do not contain asbestos, and do not cause cancer or other illnesses.
- If you believe you are sick from using J&J products that contained talc, such as Johnson’s Baby Powder and Shower to Shower, you may have an opportunity to vote on a bankruptcy plan that governs how claims will be funded and paid. This is called the “Plan”.
- Under the Plan, all qualifying current and future talc claims will be compensated. The current Plan can only move forward if 75% of voters accept the Plan.
- If the Plan is approved, you will not be able to bring a lawsuit against LTL or other parties (including J&J) for any talc claim. Instead, you will be compensated from a multi-billion-dollar trust.

KEY DATES AND DEADLINES IN BANKRUPTCY CASE	
VOTE ON THE PLAN	Vote to accept or reject the Plan. Fill out and submit the Voting Ballot by 4:00 p.m. ET on Month XX, 2023. See Question 8.
OBJECT TO THE PLAN	If you don’t like the Plan you can object. File an objection by 4:00 p.m. ET on Month XX, 2023. See Question 11.
CONFIRMATION HEARING	Hearing to consider confirmation of the Plan will begin at X:00 p.m. ET on Month XX, 2023. See Question 12.

- You may want to consult with an attorney regarding this notice and whether you should vote on the Plan.

BASIC INFORMATION

1. Why was this notice issued?

LTL has filed a chapter 11 bankruptcy case in the United States Bankruptcy Court for the District of New Jersey (see Question 14 for an explanation of chapter 11). The Bankruptcy Court authorized LTL to notify potential claimants and set a deadline for voting and objecting to the Plan. You have the right to vote on the Plan in the LTL bankruptcy if you have a talc-related illness.

This case is called *In re: LTL Management LLC*, No. 23-12825 (Bankr. D.N.J.). The Bankruptcy Court judge overseeing the case is Judge Michael B. Kaplan. LTL Management LLC (or LTL) is called the “Debtor”.

2. What is LTL?

In October 2021, J&J began a process to resolve claims raised in the talc lawsuits. As part of this process, J&J established a subsidiary called LTL Management LLC that became responsible for the legal claims related to the company's talc products, including Johnson's Baby Powder and Shower to Shower.

3. What are the Talc Claims?

The lawsuits filed generally claimed that J&J talcum powder contained asbestos which caused users to develop ovarian cancer, mesothelioma, a cancer that involves the lungs and other organs, or other talc-related illnesses. J&J discontinued Johnson's talc-based Baby Powder in May 2020 in the U.S. and Canada and sold Shower to Shower to Valeant Pharmaceuticals Inc. (now Bausch Health Cos.) in 2012.

4. How do I know if I have a Talc Claim?

In this bankruptcy, a Talc Claim is any claim for compensation for any talc-related injury, disease, or death. Talc Claims include: (1) those that have been filed but have not been resolved, dismissed, or settled (and fully paid) and (2) those that have not yet been filed.

You may have a claim if you believe any of the following were the result of your J&J talc product use: bodily injury, death, sickness, disease, emotional distress, fear of cancer, medical monitoring, or other personal injuries (whether physical, emotional, or otherwise).

THE PLAN

5. How was the Plan developed?

The Plan is the product of negotiations between LTL, J&J, and certain law firms representing Talc Claimants. The Plan is designed to pay current and future Talc Claimants fairly over time.

QUESTIONS? 1-888-431-4056 (TOLL-FREE U.S. & CANADA) OR +1-503-822-6762 (INTERNATIONAL)
OR VISIT WWW.OFFICIALTALCCLAIMS.COM

6. Who protects the interests of Future Talc Claimants?

The Future Claimants' Representative ("FCR") is an independent lawyer who was appointed by the Bankruptcy Court to represent the interests of Future Talc Claimants. The FCR will engage experienced professionals to represent and advise her in this case.

VOTING ON THE PLAN

7. Who can vote on the Plan?

Anyone who has a claim against LTL for a talc-related illness can vote on the Plan. You may also vote on behalf of a family member who is deceased, incapacitated, or a minor.

8. How can I tell the Court what I think about the Plan?

You will need to vote to accept or reject the Plan. More information is available in a Solicitation Package (see Question 14 for more details). This package includes the Plan, Ballot, and other information, including how to object to the Plan. Please see Question 9 if you or your attorney did not receive a Solicitation Package.

To be counted, your signed ballot indicating your acceptance or rejection of the Plan must be received by Epiq Bankruptcy Solutions, LLC, the appointed noticing and balloting agent, no later than **4:00 p.m. (Eastern Time) on Month XX, 2023**. Ballots should be sent:

By Mail, Overnight Courier, or Hand Delivery	Through the Bankruptcy Case Website
<p>Mail</p> <p>LTL Management LLC Claims Processing Center c/o Epiq Ballot Processing P.O. Box 4422 Beaverton, OR 97076-4422</p> <p>Overnight Courier or Hand Delivery</p> <p>LTL Management LLC c/o Epiq Ballot Processing 10300 SW Allen Blvd. Beaverton, OR 97005</p>	<p>File an E-Ballot at https://dm.epiq11.com/ltl</p> <p>You will need a Unique E-Ballot ID# that can be found in the Solicitation Package that was mailed to you or your attorney.</p>

Find more information on the voting process in *Order (A) Approving Form and Manner of Notice of Hearing on Disclosure Statement; (B) Approving Disclosure Statement; (C) Establishing Solicitation and Tabulation Procedures; (D) Scheduling a Hearing on Confirmation of Chapter 11 Plan and Approving Form and Manner of Notice Thereof; and (E) Granting Related Relief*, available at www.OfficialTalcClaims.com.

**QUESTIONS? 1-888-431-4056 (TOLL-FREE U.S. & CANADA) OR +1-503-822-6762 (INTERNATIONAL)
OR VISIT WWW.OFFICIALTALCCLAIMS.COM**

9. How do I vote on the Plan if I did not receive a Solicitation Package?

If you or your attorney did not receive a Solicitation Package this means LTL may not be aware of your Talc Claim. Visit www.OfficialTalcClaims.com or call 1-888-431-4056 to request a Solicitation Package to determine whether you can vote on the Plan.

10. What happens if I send more than one vote for the same Talc Claim or I don't file a ballot on time?

If you send more than one vote for the same claim, the last ballot received will be the vote that is counted. Ballots filed after the deadline will not be counted.

OBJECTING TO THE PLAN

11. Can I object to the Plan if I don't like it?

Yes. You must file any objections by mail or courier by **4:00 p.m. (Eastern Time)** on **Month XX, 2023**. Your objection must be filed on time and follow the guidelines in Section 11.1 of the Disclosure Statement, or it may not be considered by the bankruptcy court.

THE CONFIRMATION HEARING

12. When and where will the Bankruptcy Court decide whether to approve the Plan?

The Bankruptcy Court will hold a confirmation hearing at **X:00 x.m. (Eastern Time)** on **Month XX, 2023** at the United States Bankruptcy Court, 50 Walnut St. # 3017, Newark, NJ 07102. Judge Kaplan will oversee the hearing. The hearing may be moved to a different date or time without additional notice, so it is a good idea to check www.OfficialTalcClaims.com.

ADDITIONAL INFORMATION

13. What is Chapter 11?

The main objectives of chapter 11 are to:

- Propose a plan of reorganization to address debts and claims,
- Have eligible claimants vote to accept or reject the plan, and
- Implement the plan if the court approves it.

14. What is a Disclosure Statement?

The Disclosure Statement is a summary of information about the case and the Plan. It contains more detailed information about LTL's history, litigation against LTL, and significant events that have occurred during this chapter 11 bankruptcy case. It also provides more detail about the Plan and what happens if the Plan is approved, including how claims will be resolved and payments will

**QUESTIONS? 1-888-431-4056 (TOLL-FREE U.S. & CANADA) OR +1-503-822-6762 (INTERNATIONAL)
OR VISIT WWW.OFFICIALTALCCLAIMS.COM**

be made. In addition, the Disclosure Statement discusses the confirmation process and the voting procedures that claimants must follow for their votes to be counted.

The Disclosure Statement is available in your Solicitation Package or online at www.OfficialTalcClaims.com.

15. What could be released under the Plan?

LTL is the only Debtor in this case. LTL intends to seek a release of and injunction with the Protected Parties (see Question 16) in connection with any potential liability that they might have related to Talc Claims against LTL. If the bankruptcy court approves a release and injunction, these provisions would prevent you from filing lawsuits against LTL and the Protected Parties related to your Talc Claim. Instead, the proposed Plan for LTL will channel these claims to the trust for Talc Claimants.

16. Who are the Protected Parties?

The Protected Parties include: (a) LTL and its Representatives; (b) the Reorganized Debtor and its Representatives; (c) the LTL Corporate Parties (includes J&J) listed on Schedule 2 to the Plan and their representatives; (d) the Settling Talc Insurance Companies; (e) the retailers, parties indemnified by the Debtor, and other Persons listed on Schedule 3 to the Plan; and (f) the Imerys Protected Parties listed on Schedule 1 to the Plan.

The Schedules to the Plan are available in the Solicitation Package or at www.OfficialTalcClaims.com.

You may want to consult with an attorney regarding this Notice and whether you should Vote on the Plan.

EXHIBIT B



\$12 Billion Plan Proposed to Pay Sick Talcum Powder Users

Your rights could be impacted by a bankruptcy if you are sick now or in the future from ovarian cancer, mesothelioma, or other talc-related illnesses.

Vote to accept or reject the Plan by 4:00 p.m. (Eastern Time) on Month XX, 2023

Johnson & Johnson (“J&J”) and a subsidiary, LTL Management LLC (“LTL”), have agreed to pay \$12.08 billion over 25 years to people who claim talcum powder products made them sick. If you believe you are sick from using J&J products that contain talc, such as Johnson’s Baby Powder and Shower to Shower, you can vote to accept or reject a Plan that governs how claims will be paid in the LTL bankruptcy. You can also object to the Plan if you do not like it.

J&J and LTL maintain that their products are safe, do not contain asbestos and do not cause cancer or other illnesses. The case is *In re: LTL Management LLC*, No. 23-12825 (Bankr. D.N.J.). Please note, J&J discontinued Johnson’s talc-based Baby Powder in May 2020 and sold Shower to Shower in 2012 to another company.

What is the Plan?

Under the Plan, a settlement trust will be established to pay current and future talc claims. If the Plan is approved, you will not be able to bring a lawsuit against LTL or other parties (including J&J) for any talc claim.

Even if you have not been diagnosed with any disease or experienced any symptoms, your rights are affected. A Court-appointed Future Claimants Representative is representing your interests in the bankruptcy. You do not need to file a claim at this time.

How can I tell the Court what I think about the Plan?

You will need to vote on the Plan or object to it by **4:00 p.m. (Eastern Time) on Month XX, 2023**. More information is available in a Solicitation Package. This package includes detailed information on the bankruptcy, the Plan, and a Ballot.

Already Filed a Talc Claim: If LTL is aware of your talc claim, you or your attorney will receive a Solicitation Package and you can vote on the Plan.

Have Not Filed a Talc Claim: If LTL is not aware of your talc claim, go to www.OfficialTalcClaims.com or call 1-888-431-4056 to request a Solicitation Package to determine whether you can vote on the Plan.

When will the Court Decide on the Plan?

A hearing to consider confirmation of the Plan will begin at X:00 x.m. ET on Month XX, 2023, at the US Bankruptcy Court, 50 Walnut St. #3017, Newark, NJ 07102.